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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

EDGE ELECTRONICS, INC.

Plaintiff,

vs.

HYNIX SEMICONDUCTOR, INC.
et al. (Case No. C06-01207 PJH)

Defendants.

DRAM CLAIMS LIQUIDATION
TRUST, By Its TRUSTEE WELLS
FARGO BANK, NA,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC.,
et al. (Case No. C07-01381 PJH)

Defendants.

Case No. C 07-01207 PJH
Case No. C 07-01381 PJH

**STIPULATION AND [PROPOSED]
ORDER PROVIDING FOR
DEPOSITION OF YOUNG WOO LEE
AFTER HE OBTAINS HIS U.S. VISA**

1 WHEREAS, by Order entered on October 29, 2007, this Court granted leave
2 for Plaintiffs Edge Electronics, Inc. and DRAM Claims Liquidation Trust
3 ("Plaintiffs") to take depositions at USP Lompoc and ordered that the defendants,
4 Samsung Electronics Co., Ltd. and Samsung Semiconductor, Inc. ("Samsung") shall
5 produce Young Woo Lee, at Samsung's expense, in the United States for deposition
6 prior to December 17, 2007, for allowing his release from USP Lompoc at a date
7 and location mutually agreed upon by the parties;

8 WHEREAS, the parties mutually agreed that Samsung would produce Mr.
9 Lee for his deposition in San Francisco on December 13, 2007;

10 WHEREAS, Samsung informed Plaintiff's counsel on Monday, December 10,
11 2007, that Mr. Lee has not yet been issued a visa and will not be issued a visa by the
12 U.S. government in time for Mr. Lee to appear for his deposition in the United
13 States before December 17, 2007;

14 WHEREAS, plaintiffs are informed by Samsung's counsel that Mr. Lee is
15 also represented by personal counsel and his personal counsel is not available
16 between December 17, 2007 and December 31, 2007;

17 WHEREAS, Samsung and Plaintiffs agree to modification of this Court's
18 prior order and Samsung agrees to conduct Mr. Lee's deposition after the December
19 17, 2007 fact discovery cut-off date and to produce Mr. Lee in the United States for
20 his deposition on or before January 31, 2008;

21 WHEREAS, the parties agree that this agreement applies only to the
22 deposition of Mr. Young Woo Lee and does not apply to any other deponents or
23 discovery; and parties further agree that the conduct of Mr. Lee's deposition after the
24 December 17, 2007 fact discovery cut-off date will not be referenced by either party
25 in any application to extend the discovery cut-off date against any party;

26 NOW THEREFORE, Plaintiffs and Samsung, through their respective
27 counsel, hereby stipulate to the Court entering the attached Proposed Order.
28

1
2 Stipulated by:

3
4 LINDQUIST & VENNUM PLLP

5
6 /s/ James P. McCarthy

7 By: James P. McCarthy (*pro hac vice*)
8 Attorneys for DRAM CLAIMS
9 LIQUIDATION TRUST

10 CROWELL & MORING LLP

11
12 /s/ Jerome A. Murphy

13 By: Jerome A. Murphy (*pro hac vice*)
14 Attorneys for
15 EDGE ELECTRONICS, INC.

16 SHEPPARD MULLIN RICHTER &
17 HAMPTON LLP

18
19 /s/ David Garcia

20 By: David Garcia
21 Attorneys for
22 SAMSUNG ELECTRONICS CO,
23 LTD. AND SAMSUNG
24 SEMICONDUCTOR, INC.
25
26
27
28

1 **[PROPOSED] ORDER**

2
3 The Court hereby ORDERS:

4 1. This Court's October 20, 2007, Order ordering the Samsung
5 defendants to produce Young Woo Lee for deposition in the United States "prior to
6 December 17, 2007" is hereby modified to "before January 31, 2008." Mr. Lee's
7 deposition may be taken by plaintiffs after the December 17, 2007 discovery cut-off
8 date.

9 2. This order does not authorize the deposition of any individual
10 other than Young Woo Lee or any other discovery after the December 17, 2007 fact
11 discovery cut-off date.

12
13 **IT IS SO ORDERED.**

14
15 Dated: 12/17/07

